

# EXHIBIT 22

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1 UNITED STATES DISTRICT COURT  
2 NORTHERN DISTRICT OF GEORGIA  
3 GAINSVILLE DIVISION

4 SANTANA BRYSON AND JOSHUA  
5 BRYSON, as Administrators  
6 of the Estate of C.Z.B.,  
7 and as surviving parents of  
8 C.Z.B., a deceased minor,

9 Plaintiffs, CASE NO.  
10 vs. 2 : 22 - CV - 017 - RWS  
11 ROUGH COUNTRY, LLC,  
12 Defendant.

13 VIDEOTAPE DEPOSITION OF G. BRYANT BUCHNER, P.E.  
14 APPEARING REMOTE FROM  
15 TALLAHASSEE, FLORIDA

16  
17 JANUARY 23, 2024  
18 11:13 A.M.

19  
20  
21 Reported Remotely By:  
22 Judith L. Leitz Moran  
23 RPR, RSA, CCR-B-2312  
24  
25

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1 Q Right.

2 A You -- you could calculate it from this  
3 if you -- potentially but, you know, it -- you  
4 don't need it.

5 Q All right. And you -- you basically  
6 accounted for a zero pre-impact speed for the  
7 Escape --

8 A Yes.

9 Q -- in the calculations?

10 A Yes.

11 Q And then your post-impact speed for the  
12 Escape was what?

13 A 40.6 miles an hour in my calculation.

14 Q Okay. And so the delta-V for the Escape  
15 will be approximately the same; is that right, or  
16 no?

17 A What was the question?

18 Q Yeah. So what was the delta-V of the  
19 Escape?

20 A 40.6.

21 And I misspoke a minute ago. If we input  
22 the 0 miles per hour -- well, anyway, we did it --  
23 we did set up a series of equations that used the  
24 -- that saw for the restitution. I said we didn't  
25 do that, but we did actually -- we did use the

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1       bit, we want to take the tires out of that, the  
2       .35 inches, which is in the fourth box down, is  
3       only .03 feet.

4                   So if we do .55 minus .03 we get .52.  
5       And that's .52 feet, multiply that by 12, we get 6  
6       1/4 inches.

7                   So effectively the total lift was closer  
8       to 6 1/2 and the body lift was a little over 6.  
9       Just to clarify.

10                  And so 6.1 that I put in the report was  
11       the body lift. It was intended to be the body  
12       lift. So the body lift really is a little over 6  
13       inches. When you add the tires in you're closer to  
14       the 6 1/2 inches.

15                  So I -- I was mistaken when I said 5 1/2  
16       earlier. I missed my decimal points. And I -- I  
17       thought the .35 or the .7 that's right there was in  
18       feet. It's not. It's -- I thought it was at  
19       .07 feet, it's not, it's .07 inches, and so I made  
20       a mistake. So body lift is more than 6 inches.

21                  Q       The third box that has the bracket  
22       height, how did you come up with those numbers,  
23       those values?

24                  A       Well, I laid on the ground under both  
25       vehicles and measured the height off the ground.